

# EXHIBIT “J”

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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MATTHEW RALSTON,	:	
	:	
Plaintiff,	:	CIVIL ACTION
	:	
v.	:	
	:	
MITCHELL GARABEDIAN, ESQUIRE, et al,	:	
	:	NO. 2:19-cv-01539
Defendants.	:	

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**GARABEDIAN DEFENDANTS' DEPOSITION DESIGNATIONS OF MATTHEW  
RALSTON**

**I. July 1, 2021 Deposition**

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Respectfully submitted,

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Jeffrey B. McCarron  
Candidus K. Dougherty  
Swartz Campbell LLC

Dated: December 21, 2021

# EXHIBIT “K”

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

MATTHEW RALSTON,	:	
	:	
Plaintiff,	:	CIVIL ACTION
	:	
v.	:	
	:	
MITCHELL GARABEDIAN, ESQUIRE, et al,	:	
	:	NO. 2:19-cv-01539
Defendants.	:	

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**GARABEDIAN DEFENDANTS' DEPOSITION DESIGNATIONS  
OF CHARLES GRADE**

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Respectfully submitted,

/s/ Candidus K. Dougherty  
Jeffrey B. McCarron  
Candidus K. Dougherty  
Swartz Campbell LLC

Dated: December 21, 2021

# EXHIBIT “L”

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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MATTHEW RALSTON,	:	
Plaintiff,	:	CIVIL ACTION
v.	:	
	:	
MITCHELL GARABEDIAN, ESQUIRE, et al,	:	
	:	NO. 2:19-cv-01539
Defendants.	:	

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**GARABEDIAN DEFENDANTS' DEPOSITION DESIGNATIONS  
OF MARY ELLEN POULOS**

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Respectfully submitted,

/s/ Candidus K. Dougherty

Jeffrey B. McCarron  
Candidus K. Dougherty  
Swartz Campbell LLC

Dated: December 21, 2021

# EXHIBIT “M”

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

MATTHEW RALSTON,	:	
	:	
Plaintiff,	:	CIVIL ACTION
	:	
v.	:	
	:	
MITCHELL GARABEDIAN, ESQUIRE, et al,	:	
	:	NO. 2:19-cv-01539
Defendants.	:	

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**GARABEDIAN DEFENDANTS' DEPOSITION DESIGNATIONS  
OF KURTIS POULOS**

**I. November 19, 2021 Deposition**

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8. 42:1 - 42:6
9. 43:14 - 44:3
10. 44:5 - 44:9
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12. 44:13 - 44:14
13. 44:16 - 44:19
14. 45:24 - 47:16
15. 47:19 - 47:25
16. 48:3 - 48:12
17. 48:15 - 49:4
18. 49:19 - 50:9
19. 50:23 - 52:8
20. 52:11 - 52:25
21. 53:2 - 53:3
22. 53:5 - 53:19
23. 53:20 - 53:21
24. 53:24 - 54:9
25. 56:15 - 57:23

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34. 61:23 - 63:4

35. 63:25 - 64:4

36. 65:2 - 65:14

37. 65:17 - 66:12

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52. 81:12 - 86:18

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58. 94:15 - 97:17

59. 102:25 - 107:14

60. 107:20 - 109:4

61. 109:7 - 114:5

62. 114:7 - 116:5

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64. 116:9 - 119:1

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69. 125:1

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78. 134:16 - 135:19

79. 136:15 - 136:21

80. 137:8 - 140:3

81. 140:6 - 140:25

82. 141:3 - 143:19

83. 146:2 - 146:13

84. 147:18 - 148:2

85. 148:6 - 148:11

86. 148:15 - 148:16

87. 151:10 - 151:13

88. 153:17 - 153:24

89. 155:7 - 155:15

90. 156:4 - 156:10

91. 156:21 - 156:24

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93. 157:22 - 158:9

94. 158:11 - 158:15

95. 162:10 - 162:22

96. 162:24 - 162:25

97. 163:2 - 163:7

98. 163:9 - 163:21

Respectfully submitted,

/s/ Candidus K. Dougherty

Jeffrey B. McCarron  
Candidus K. Dougherty  
Swartz Campbell LLC

Dated: December 21, 2021

# EXHIBIT “N”

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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MATTHEW RALSTON,	:	
Plaintiff,	:	CIVIL ACTION
v.	:	
	:	
MITCHELL GARABEDIAN, ESQUIRE, et	:	
al,	:	NO. 2:19-cv-01539
	:	
Defendants.	:	

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**GARABEDIAN DEFENDANTS' OBJECTIONS TO PLAINTIFF'S EXHIBIT LIST**

Defendants, Mitchell Garabedian, Mitchell Garabedian, Esquire d/b/a Law Offices of Mitchell Garabedian (collectively "Garabedian defendants"), by and through counsel, Swartz Campbell LLC, hereby object to plaintiff's proposed trial exhibits as cumulative of other evidence, unduly prejudicial, character evidence, irrelevant, lacking in foundation, unauthenticated and inadmissible hearsay not subject to any exceptions. Garabedian defendants also object to aggregated documents on the basis that specific documents, pages or portions from the aggregated documents plaintiff intends to use at trial were not identified.

Subject to the foregoing general objections, Garabedian defendants object to plaintiff's specific proposed trial exhibits:

Exhibit No.	Description	Reason(s)
2	Expert Report and CV of Shanin Specter, Esq.	Rule 402 Rule 404 Rule 608 Rule 802
3	Expert Report and CV of James C. Schwartzman, Esq.	Rule 402 Rule 404 Rule 608 Rule 802

4	Expert Reports and CV of Barbara Ziv, M.D.	Rule 402 Rule 403 Rule 404 Rule 608 Rule 802
4	Evaluation of Poulos	Rule 402 Rule 403 Rule 404 Rule 608 Rule 802
4	Evaluation of Ralston	Rule 402 Rule 404 Rule 608 Rule 802
4	Appendixes A-G	Rule 802
5	Expert Report and CV of Andrew Verzilli	Rule 802
6	Yearbook Pages 1994 1995 1996 1997 2009	Rule 402 Rule 608 Rule 802
7	Plaintiff's Resume 2020	Rule 402 Rule 608 Rule 802
8	Class of '97 yearbook Photos	Rule 402 Rule 608
9	Correspondence re: Departure from Hill	Rule 402 Rule 802
10	Student Evals of Plaintiff	Rule 402 Rule 404 Rule 608 Rule 802 Rule 901
11	Note from Student at Andrews School	Rule 402 Rule 404 Rule 608

		Rule 802 Rule 901
12	Letters from Administrators/Colleagues	Rule 402 Rule 404 Rule 608 Rule 802 Rule 901
13	Speech by Chris Howell	Rule 402 Rule 404 Rule 608 Rule 802 Rule 901
14	Ltr. from Zwerner (Poulos' Cousin)	Rule 402 Rule 404 Rule 608 Rule 802 Rule 901
15	Plaintiff Employment records - Leelanau School	Rule 402 Rule 404 Rule 608 Rule 802
16	Hill School Production (K. Poulos)	Rule 402 Rule 404 Rule 608 Rule 802
17	Marquette University - Kurtis Poulos	Rule 402 Rule 802
18	Kurtis Poulos Unofficial Undergraduate Transcript - Marquette University	Rule 402 Rule 802
19	Marquette University - Mary Ellen Poulos	Rule 402 Rule 802
20	Mary Ellen Poulos Unofficial Transcript - Marquette University	Rule 402 Rule 802
21	Records of Charles Grade (K. Poulos)	Rule 402 Rule 403 Rule 404

		Rule 608 Rule 802
22	Plaintiff's Income Tax Returns	Rule 402 Rule 802
23	Mary Ellen Poulos Production	Rule 402 Rule 802
24	Hill School Production - Plaintiff	Rule 402 Rule 404 Rule 608 Rule 802
25	Ph.D. Dissertation Acknowledgement	Rule 402 Rule 404 Rule 608 Rule 802
26	Note from Dismissed Hill Student	Rule 402 Rule 404 Rule 608 Rule 802 Rule 901
27	The Hill School Bulletin references	Rule 402 Rule 802
28	Text Messages Re: Wallace Gundy	Rule 402 Rule 403 Rule 608 Rule 802
29	Upper School East Photo	Rule 402 Rule 403 Rule 608
30	'94 - '95 Geometry Materials	Rule 402 Rule 403
31	'94 - '95 Geometry Student Reviews	Rule 402 Rule 404 Rule 608 Rule 802 Rule 901
32	'94 - '95 Math 4 Student Reviews	Rule 402 Rule 404

		Rule 608 Rule 802 Rule 901
33	Campus Map	Rule 402
34	Floor Plans/Permits Upper School Basement - The Hill School	Rule 402
35	Verizon Records, K. Poulos	Rule 402
36	Hill School Leave/Departure Correspondence (2019)	Rule 402 Rule 802
37	American Strategic Insurance Records (Poulos)	Rule 402 Rule 403 Rule 404 Rule 608 Rule 802
38	Medical Records of Lisa Havens (Plaintiff -Psych)	Rule 402 Rule 403 Rule 404 Rule 608 Rule 802
39	Medical Records of Phillip Seimer, M.D.	Rule 402 Rule 403 Rule 404 Rule 608 Rule 802
40	Medical Records of Nathan March, D.O.	Rule 402 Rule 403 Rule 404 Rule 608 Rule 802
41	Medical Records of Pottstown Medical Specialists (Goldberg)	Rule 402 Rule 403 Rule 404 Rule 608 Rule 802
42	Handwritten Notes of Plaintiff	Rule 402

		Rule 802
43	State of Maryland Criminal Records - Poulos	Rule 105 Rule 402 Rule 404 Rule 901
44	Milwaukee Circuit Court Criminal Records - Poulos	Rule 105 Rule 402 Rule 404 Rule 901
45	Worcester County Criminal Records - Poulos	Rule 105 Rule 402 Rule 404 Rule 901
46	Affidavit of Kerith Iverson Brand	Rule 402 Rule 802 Rule 901
47	Cozen O' Conner Production	Rule 402 Rule 802 Rule 901
48	Correspondence w/ Hill School (Counsel)	Rule 402 Rule 802 Rule 901
49	Social Security Calculator	Rule 402 Rule 901
50	Andrews School Employment File	Rule 402 Rule 802 Rule 901
51	Cards/Notes to Plaintiff (formerly P8)	Rule 402 Rule 608 Rule 802 Rule 901
52	Capital Giving Office Webpage (formerly P51)	Rule 402 Rule 802 Rule 901
53	Poulos Cumulative correspondence with The Beasley Firm	Rule 402 Rule 802

54	Hill School Supplemental Production ("HILLRAL")	Rule 402 Rule 802 Rule 901
55	Garabedian Production. November, 2020. ("Garabedian")	Rule 402 Rule 403 Rule 404 Rule 608 Rule 613 Rule 802
56	Garabedian File Production. March, 2021. Garabedian_File 1-273 (Poulos File)	Rule 402 Rule 403 Rule 404 Rule 608 Rule 613 Rule 802
57	Garabedian File Production. March, 2021. Garabedian_File 274-1244 (Poulos Medical Records)	Rule 402 Rule 403 Rule 404 Rule 608 Rule 613 Rule 802
58	Garabedian File Production. March, 2021. Garabedian_File 1245-1853 (Poulos Medical Records)	Rule 402 Rule 403 Rule 404 Rule 608 Rule 613 Rule 802
59	Garabedian File Production. March, 2021. Garabedian_File 1854-1960 (Misc. Correspondence)	Rule 402 Rule 403 Rule 404 Rule 608 Rule 613 Rule 802
60	Garabedian File Production. March, 2021. Garabedian_Email 1-129 (Emails)	Rule 402 Rule 403 Rule 404 Rule 608 Rule 613 Rule 802
61	Leslie Gomez Privilege Log and Documents	Rule 402

		Rule 802
62	Depositions of Kurtis Poulos (Cumulative) (Transcripts and/or video recording)	Rule 105 Rule 402 Rule 802
63	Depositions of Matthew Ralston (Cumulative) (Transcripts and/or video recording)	Rule 402 Rule 802
64	Deposition of Mitchell Garabedian, Esq. (Transcript and/ or video recording)	Rule 402
65	Deposition of Daniel Mahoney, Esq. (Transcripts and/or video recording)	Rule 402 Rule 802
66	Deposition of Nathan Gaul, Esq. (Transcript and/or video recording)	Rule 402 Rule 802
67	Deposition of Mary Ellen Poulos (Transcript and/or video recording)	Rule 402 Rule 802
68	Deposition of Zachary Brusko (Transcript and/or video recording)	Rule 402 Rule 802
69	Deposition of Charles Grade, M.D. (Transcript and/or video recording)	Rule 105 Rule 402 Rule 403 Rule 802
70	Deposition of Mark Ralston (Transcript and/ or video recording)	Rule 402 Rule 802
71	Deposition of Mary Beth Ralston (Transcript and/or video recording)	Rule 402 Rule 802
72	Deposition of Christopher Chirielesion (Transcript and/or video recording)	Rule 402 Rule 802

73	Deposition of William Yinger (Transcript and/or video recording)	Rule 402 Rule 802
74	Deposition of Christopher Hopkins (Transcript and/or video recording)	Rule 402 Rule 802
75	Deposition of Zachary Lehman (Transcript and/ or video recording)	Rule 402 Rule 802
76	Deposition of Leslie Gomez (Transcript and/ or video recording)	Rule 402 Rule 802
77	Deposition of Thomas Rees (Transcript and/or video recording)	Rule 402 Rule 802
78	Deposition of Andrew Verzilli (Transcript and/or video recording)	Rule 402 Rule 802
79	Deposition of Shanin Specter, Esq. (Transcript and/ or video recording)	Rule 402 Rule 403 Rule 404 Rule 608 Rule 802
80	Deposition of Barbara Ziv, M.D. (Transcript and/or video recording)	Rule 402 Rule 403 Rule 404 Rule 608 Rule 802
81	Deposition of Robert Tintner, Esq. (Transcript and/or video recording)	Rule 402 Rule 802
82	Deposition of Clifford Haines, Esq. (Transcript and/or video recording)	Rule 402 Rule 802
83	Deposition of Frank Fetterolf, M.D. (Transcript and/or video recording)	Rule 402 Rule 802

84	Deposition of Ben Walborn (Transcript and/or video recording)	Rule 402 Rule 404 Rule 608 Rule 802
85	Expert Report and CV of Robert Tintner, Esq.	Rule 402 Rule 802
86	Expert Report and CV of Clifford Haines, Esq.	Rule 402 Rule 802
87	Expert Report and CV of Gladys Fenichel, M.D.	Rule 402 Rule 802
88	Expert Report and CV of Frank Fetterolf, M.D.	Rule 402 Rule 802
89	Expert Report and CV of Stephen Scherf, CPA	Rule 402 Rule 802
90	Expert Report and CV of Michael Smychynsky, MBA	Rule 402 Rule 802
91	Plaintiff's Cumulative Responses to Discovery	Rule 402 Rule 802
92	Defendants' Cumulative Responses to Discovery	Rule 402 Rule 802
93	Plaintiff's Discovery Requests to Defendant Poulos	Rule 105 Rule 402 Rule 802
94	Defendant Poulos' Answer to Second Amended Complaint	Rule 105 Rule 402 Rule 802
95	Defendant Poulos' Motion to Dismiss SAC	Rule 105 Rule 402 Rule 802
96	Defendant Poulos' Motion for Judgment on the Pleadings	Rule 105 Rule 402 Rule 802
97	Defendant Poulos' Motion for Protective Order	Rule 105 Rule 402 Rule 802

98	Defendant Poulos' Cross-Claim Against Defendant Garabedian	Rule 105 Rule 402 Rule 802
99	Defendant Poulos' Motion for Summary Judgment	Rule 105 Rule 402 Rule 802

Respectfully submitted,

/s/ Candidus K. Dougherty  
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Date: December 21, 2021